

# COHEN & GREEN

June 1, 2022

Hon. James R. Cho, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

By Electronic Filing.

**Re: Hoover v. City of New York, Case No. 21-cv-04783-EK-JRC**

Dear Judge Cho:

I am co-counsel for Plaintiffs in the above-captioned matter. I write to request an extension of the time set at the initial conference to join Doe Defendants (by amending the complaint). Defendants consent to this request.

The Court set the date to join additional parties as June 1, directing that the “City shall move expeditiously to assist plaintiffs in identifying any remaining Doe defendants.” *See* Jan. 18, 2022 Minute Order. While the parties have identified one Doe — and accordingly amended the complaint (*see* Dkt. No. 28) and served the new party — the others have proven more difficult.

Therefore, given that some discovery is necessary for further identification, Plaintiffs respectfully request the Court extend the deadline to join parties from June 1 until 30 days from the service of responses to document requests and interrogatories. That will allow the Plaintiffs time to review answers to their requests and to potentially ask follow-up or confirmatory questions of Defendants. As noted above, Defendants consent.

As always, I thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/

J. Remy Green

*Honorific/Pronouns: Mx., they/their/them*

**COHEN&GREEN P.L.L.C.**

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cc:

All relevant parties by ECF.